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COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

August 7, 1998

Magalie Roman Salas, Secretary
Office of the Secretary
Federal Communications Commission
1919 M Street N.W.
Washington, D.C. 20554

RE: FCC Docket No. 95-116
CC Docket No. 98-116
DA Notice 98-1080

Dear Ms. Salas:

I am filing the enclosed Comment on behalf of the Pennsylvania Public Utility Commission. I have enclosed an original and four (4) copies of the Comment along with a copy of the Comment on a read-only disc in WordPerfect 5.1. Additionally, I have enclosed a copy to be time-stamped and returned to me in the attached self-addressed envelope.

Sincerely yours,

Amy L. Putnam
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Enclosures

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of)
)
NANC Report on Wireless-Wireline)
Integration including the Architecture)
and Administration Plan for Local)
Number Portability)
_____)

FCC Docket No. 95-116
CS Docket No. 98-116
DA Notice 98-1080

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COMMENT OF
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

I. INTRODUCTION

On May 18, 1998, the Federal Communications Commission's (FCC) Common Carrier Bureau (CCB) received a Report from the North American Numbering Council (NANC) on Local Number Portability (LNP) Administration of Wireline and Wireless Integration (NANC Integration Report) under the Telecommunications Act of 1996 (TA-96). The Pennsylvania Public Utility Commission (PaPUC) hereby submits this Comment on the NANC Integration Report.

II. THE PENNSYLVANIA POSITION

1. In the NANC Integration Report, the Local Number Portability Administration Working Group (LNPAWG) made two recommendations:
 - a. that the wireless industry will complete a feasibility study to replace or modify the Local Service Request process for wireless to wireless porting; and
 - b. that porting intervals for wireless to wireless porting be 30 minutes for FOC and two business hours for the porting process through the NPAC/SMS.
2. The report identifies several open issues, noting that:
 - a. the report does not consider LNP impacts on resellers, which will be studied during the last half of 1998;
 - b. nationwide roaming cannot be supported unless **all** mobile identification number-based wireless systems separate and reprogram mobile telephones for discrete mobile identification and mobile directory numbers;
 - c. consensus was not reached on porting between wireline and wireless carriers, and to the extent that the FCC chooses to address any potential public policy

issues associated with the rate center issue, the industry may need to revisit some of the wireless wireline integration requirements;

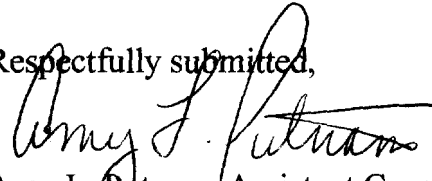
d. alternative solutions to the impact of local number portability on Short Message Service are being evaluated at various standards group levels.

3. With respect to the specific recommendations in this report, the Pennsylvania Public Utility Commission (PaPUC) strongly supports completion of a feasibility study which would be of benefit to the wireless industry in offering a viable method of implementing wireless to wireless porting.

4. The PaPUC supports any industry initiative which will decrease the porting interval, because any such decrease will increase the benefits of telephone competition to the consumer.

5. The PaPUC further urges on behalf of itself and every other state that is facing number exhaust, that there be continued study and expeditious attempts to reach consensus on those issues identified in the NANC Integration Report as Open Issues.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Amy L. Putnam".

Amy L. Putnam, Assistant Counsel
Pennsylvania Public Utility Commission

Bohdan R. Pankiw, Chief Counsel
Pennsylvania Public Utility Commission

Frank Wilmarth, Deputy Chief Counsel
Pennsylvania Public Utility Commission

August 7, 1998

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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| and Administration Plan for Local |) | |
| Number Portability |) | |
| |) | |

CERTIFICATE OF SERVICE

I, Amy L. Putnam, hereby certify that I have on this 7th day of August, I served a true and correct copy of the Comment of the Pennsylvania Public Utility Commission (PaPUC) upon the persons and in the manner indicated below:

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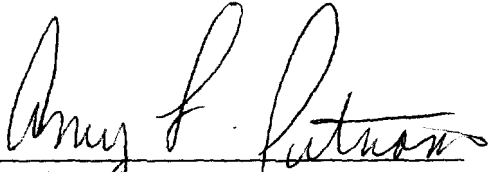
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DATED: August 7, 1998